

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
NORTHERN DIVISION

Filed in U.S. Bankruptcy Court  
Atlanta, Georgia  
M. Regina Thomas, Clerk

APR 16 2021  
By: [Signature]  
Deputy Clerk

IN RE: ) CASE NO.: 21-51596  
Kathy Raydean Rodgers )  
Debtor ) CHAPTER 13

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**OPPOSITION/REPLY TO CHAPTER 13 TRUSTEE'S  
UNSIGNED OBJECTION TO CONFIRMATION**

COMES NOW Kathy Raydean Rodgers and files this opposition/reply to the Chapter 13 Trustee unsigned Objection to Confirmation of the Chapter 13 Plan (Doc 18) filed by Sonya Buckley Gordon, an Attorney for Chapter 13 Trustee for alleged failure to appear at the March 8, 2021, Creditor's Meeting.

On March 8, 2021, a Motion for enlargement of time was filed with the Court to file the required documents and the Confirmation Plan. On April 5, 2021, the Court granted the motion and specifically stated as follows:

"The Debtor's meeting of creditors is scheduled for April 8, 2021, and without the filing of these documents, the meeting cannot proceed. It is

ORDERED that the Debtor shall file the chapter 13 plan, schedules, statement of financial affairs, and other documents required by 11 U.S.C. § 521 within **14 days** of the entry date of this order." [emphases added]

The Order clearly states that without filing the documents required under 11 U.S.C. 521, "the meeting cannot proceed." It is unclear why the Chapter 13 Trustee and or its attorney has decided to ignore the part of the order "the meeting cannot proceed." and decided to take the drastic measure and file the instant unsigned objection to confirmation and is asking for a dismissal of the case and/or convert the case to Chapter 7.

The required documents were timely filed on April 15, 2021, well within the allowed by the Court time. The Court is respectfully requested to Overrule the objection as baseless.

Respectfully submitted,

/s/Kathy Raydean Rodgers  
Kathy Raydean Rodgers

Date: April 16, 2021

**Certificate of Service**

I the undersigned hereby certify that the Opposition/reply to the Objection to Confirmation was served upon the following parties by regular mail on the date listed below.

Mary Ida Townson  
Chapter 13 Trustee  
285 Peachtree Center Ave, NE  
Suite 1600  
Atlanta, GA 30303

Joshua M. Ryden,  
Padgett Law Group  
6267 Old Water Oak Rd Ste. 203  
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Attorneys for Nationstar Mortgage LLC

/s/Kathy Raydean Rodgers  
Kathy Raydean Rodgers

Date: April 16, 2021